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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-third session
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Item (3) of the provisional agenda
Listing, classification and packing

Viscous liquids not subject to the regulation

Submitted by the expert from Spain*

Introduction

1. Viscous liquids, according to 2.3.2.5.1 of the Model Regulations, are not subject to those Regulations if they have a "flash point of 23 °C or above and less than or equal to 60 °C" and fulfil several other conditions, if additionally the results of two tests (solvent separation test and viscosity test) are in between different values:

"2.3.2.5.1 Except as provided for in 2.3.2.5.2, viscous liquids which:

- have a ***flash point of 23 °C or above and less than or equal to 60 °C***;
- are not toxic, corrosive or environmentally hazardous;
- contain not more than 20% nitrocellulose provided the nitrocellulose contains not more than 12.6% nitrogen by dry mass; and
- are packed in receptacles of not more than 450 litre capacity;

are not subject to these Regulations, if:

(a) in the solvent separation test (see *Manual of Tests and Criteria*, Part III, sub-section 32.5.1), the height of the separated layer of solvent is less than 3% of the total height; and

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

(b) the flowtime in the viscosity test (see Manual of Tests and Criteria, Part III, sub- section 32.4.3), with a jet diameter of 6 mm is equal to or greater than:

(i) 60 seconds; or

(ii) 40 seconds if the viscous liquid contains not more than 60% of Class 3 substances."

2. In the Manual of Tests and Criteria, it is indicated for the solvent separation test in 32.5.1 that this test is used to determine the extent of solvent separation in viscous liquids with a ***flash point of less than 23 °C***.

3. Therefore, in the cases in which paragraph 2.3.2.5.1 of the Model Regulations obliges to do the test (flash point of 23 °C or above and less than or equal to 60 °C), the solvent separation test as indicated under 32.5.1 of the Manual of Tests and Criteria is never in the range that makes it applicable.

4. According to our experts, the flash point of the liquid is not a critical factor for being able to carry out the solvent separation tests, and it would be possible to carry out this test for liquids with a flash point of above 23 °C. Therefore, the expert from Spain would suggest amending paragraph 32.5.1.1 of the Manual of Tests and Criteria by eliminating the temperature range for this test.

Proposal

5. It is proposed to amend 32.5.1.1 of the Manual of Tests and Criteria in the following way (deleted text **~~stricken through and bold~~**):

"32.5.1.1 Introduction

This test is used to determine the extent of solvent separation in viscous liquids such as paints, enamels, varnishes, adhesives and polishes **~~with a flash point of less than 23C~~**."